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4 **UNITED STATES DISTRICT COURT**
5 **WESTERN DISTRICT OF WASHINGTON AT TACOMA**

6 ALMOG MEIR JAN, SHLOMI ZIV, and
7 ANDREY KOZLOV,

Plaintiffs,

8 v.

9 PEOPLE MEDIA PROJECT, a Washington
10 Non-Profit Corporation, d/b/a PALESTINE
11 CHRONICLE; RAMZY BAROUD; JOHN
12 HARVEY; and DOES 1 through 10,

Defendants.

NO. 3:24-cv-05553-TMC

**STIPULATED MOTION FOR
EXTENSION OF TIME TO JOIN
PARTIES AND AMEND
PLEADINGS**

*NOTED FOR HEARING:
JUNE 13, 2025*

13 Plaintiffs and Defendants, by and through their undersigned counsels, respectfully
14 submit this Stipulated Motion for Extension of Time to Join Parties and Amend Pleadings. In
15 support of their Motion, the Parties state as follows:

16 **I. BACKGROUND**

17 1. Plaintiffs filed their Amended Complaint (the “Complaint”) on February 21,
18 2025 [Dkt. 41]. The Complaint includes three named Defendants and ten unnamed Defendants,
19 whom Plaintiffs expect to identify in the course of discovery.

20 2. On March 3, 2025, this Court entered an Order Setting Bench Trial and Pretrial
21 Dates [Dkt. 44]. That Order set the deadline for filing motions to join parties for June 2, 2025,
22 and the deadline for amending pleadings for June 12, 2025.
23

MOTION FOR EXTENSION OF TIME TO JOIN PARTIES AND
AMEND PLEADINGS - 1

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3. On March 13, 2025, Defendants moved to dismiss the Amended Complaint and to stay discovery pending resolution of their Motion to Dismiss [Dkts. 45–46].

4. Plaintiffs served Requests for Admission, Interrogatories, and Requests for Production on Defendant People Media Project on April 18, 2025. *See Exhibit A*. These requests, in part, seek to identify additional individuals employed by or who collaborated with Defendants. Defendant People Media Project’s responses were due May 11, 2025.

5. On May 6, 2025, the Court denied Defendants’ Motion to Dismiss and consequently denied their motion to stay as moot [Dkt. 55].

6. Following the Court’s decision, the Parties agreed to extend Defendant People Media Project’s deadline to respond to Plaintiffs’ discovery requests to May 30, 2025.

7. On May 30, counsel for Defendant People Media Project requested an additional two-day extension to June 3, 2025, to which Plaintiffs agreed.

II. ARGUMENT

8. The Parties respectfully request a 45-day extension of the deadline to join parties, to July 17, 2025, to provide Plaintiffs sufficient time to analyze Defendant People Media Project’s discovery responses and determine whether there are other individuals appropriate to join as parties in this matter. The Parties also request a commensurate extension, to July 28, 2025, of the deadline to amend pleadings, should discovery reveal a basis to do so.

9. This Court may modify a scheduling order upon a showing of good cause. *See* Fed. R. Civ. P. 16(b)(4). “Rule 16(b)’s ‘good cause’ standard primarily considers the diligence of the party seeking the amendment.” *Johnson v. Mammoth Recreations*, 975 F.2d 604, 609 (9th Cir. 1992). If a deadline “cannot reasonably be met despite the diligence of the party seeking the extension,” the Court may modify the pretrial schedule. *Id.* (citation omitted).

1 10. Here, Plaintiffs acted with diligence to identify additional individuals who were
2 employed by or collaborated with Defendants to aid and abet the violations of international
3 law that injured Plaintiffs.

4 11. On April 18, Plaintiffs served discovery requests on Defendant People Media
5 Project seeking information about Defendant's officers and employees, including
6 communications between those officers and employees and Abdallah Aljamal, the Hamas
7 operative and Palestine Chronicle "journalist" who held Plaintiffs hostage in his home.

8 12. Defendant People Media Project has yet to respond to those requests, and
9 Plaintiffs have agreed to Defendants' requests for extensions to respond.

10 13. It is likely that Defendant People Media Project's responses to those requests
11 will identify which of those individuals had sufficient knowledge of and interactions with
12 Aljamal to be joined as defendants.

13 14. However, at this time, despite Plaintiffs' diligence, they have been unable to
14 access that information and are therefore unable to meet the current deadline to join parties and
15 to amend pleadings.

16 WHEREFORE, the Parties respectfully request a 45-day extension of the deadline to
17 join parties, to July 17, 2025, and a commensurate extension of the deadline to amend
18 pleadings, to July 28, 2025, or any other dates the Court considers appropriate.

19 //

20 //

21 //

22 //

23 //

DATED this 12th day of June 2025.

Plaintiff's Trial Counsel

Defendants' Trial Counsel

/s/Aric S. Bomsztyk

/s/Daniel Kovalik

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MOTION FOR EXTENSION OF TIME TO JOIN PARTIES AND
AMEND PLEADINGS - 4

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Exhibit A

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WESTERN DISTRICT OF WASHINGTON AT TACOMA

5 ALMOG MEIR JAN, SHLOMI ZIV, and
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8 PEOPLE MEDIA PROJECT, a Washington
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HARVEY; and DOES 1 through 10,

10 Defendants.

NO. 3:24-cv-05553-TLF

**PLAINTIFFS' FIRST
INTERROGATORIES &
REQUESTS FOR PRODUCTION**

11 **PLAINTIFFS' FIRST INTERROGATORIES & REQUESTS FOR PRODUCTION**
12 **TO DEFENDANT:**

PEOPLE MEDIA PROJECT d/b/a PALESTINE CHRONICLE

13 Pursuant to Federal Rule of Civil Procedure 34, Plaintiffs Almog Meir Jan, Shlomi Ziv,
14 and Andrey Kozlov (collectively, "Plaintiffs"), request that Defendant People Media Project
15 d/b/a Palestine Chronicle respond to the following Interrogatories and produce documents for
16 inspection and copying within thirty (30) days of service of these Interrogatories and Requests
17 for Production, at the offices of the attorneys for Plaintiffs, Tomlinson Bomsztyk Russ, 1000
18 Second Avenue, Suite 3660, Seattle, Washington 98104, or at such other place as may be
19 agreed upon, the documents and things within Palestine Chronicle's possession, custody, or
20 control as set forth below.

21 The following definitions and instructions apply:

22 **DEFINITIONS**

- 23 1. "Plaintiffs" refers to all Plaintiffs in this action or to any of them.

1 2. “Defendants” refers to the Defendants named in the First Amended Complaint,
2 including Does 1-10, and any employees, attorneys, partners, agents, representatives, or any
3 other Person or entity acting or purporting to act on their behalf, including any entity
4 Defendants have ever had any control over, ownership of, or ownership interest in who has
5 possession, custody, control, knowledge, or responsibility for any communication or document
6 sought by these Requests.

7 3. “Palestine Chronicle” means Defendant People Media Project d/b/a Palestine
8 Chronicle.

9 4. “Baroud” means Defendant Ramzy Baroud.

10 5. “Harvey” means Defendant John Harvey.

11 6. “Aljamal” means Abdallah Aljamal.

12 7. “You” or “Your” means Defendant People Media Project d/b/a Palestine
13 Chronicle as well as any directors, agents, employees, independent contractors, volunteers,
14 attorneys, partners, agents, representatives, or any other person or entity acting or purporting
15 to act on behalf the Defendant People Media Project d/b/a Palestine Chronicle.

16 8. The singular form of a word should be interpreted in the plural as well. Any
17 pronoun shall be construed to refer to the masculine, feminine, or neuter gender, whichever in
18 each case is broadest. The words “and” and “or” shall be construed conjunctively or
19 disjunctively, whichever makes the Request more inclusive.

20 9. The terms “Relating,” “Relate”, and/or “Related” includes but is not limited to
21 the following meanings: pertaining, concerning, referring, discussing, mentioning, containing,
22 reflecting, evidencing, constituting, describing, showing, identifying, proving, disproving,
23

1 consisting of, supporting, contradicting, in any way legally, logically, or factually connected
2 with the matters referenced.

3 10. “All” shall be construed to include “any” and “each,” “any” shall be construed
4 to include “all” and “each,” and “each” shall be construed to include “all” and “any,” in each
5 case as is necessary to bring within the scope of these interrogatories documents and things
6 that might otherwise be construed as outside their scope.

7 11. “Identify” or “Identity” means:

8 (a) When used with reference to a natural person, to state his or her full name,
9 present home address, present business address, present home and business telephone number,
10 present or last known position, and business affiliation at the time in question.

11 (b) When used with reference to an entity, such as a partnership (either general or
12 limited), joint venture, trust, or corporation, to state the full legal name of such entity, each
13 name under which such entity does business, the entity’s telephone number, and the identity
14 of the chief operating officer, manager, trustee, or other principal representative.

15 (c) When used with reference to documents, to state specifically:

16 (i) The type of document involved (*e.g.*, letter, interoffice memorandum,
17 etc.), together with information sufficient to enable the location of the
18 document such as its date, the name of any addressee and the name of any
19 signor, the title or the heading of the document and its approximate
20 number of pages; and

21 (ii) The identity of the custodian or other person last known to have
22 possession of the document, together with the present or last known
23 location of the document.

1 12. “Describe” or “State with Particularity” means to state every material fact and
2 circumstance specifically and completely, including without limitation date, time, location,
3 amount, quantity and identity of all participants, and whether each such fact or circumstance
4 is stated on knowledge, information, or belief, or is alleged without foundation.

5 13. “Person(s)” means natural persons as well as all entities, including, without
6 limiting the generality of the foregoing, business, non-profit, legal or governmental entity,
7 associations, organization, associations, companies, partnerships, joint ventures, corporations,
8 trusts, estates, public agencies, municipalities, departments, bureaus, commissions and boards.
9 Conversely, “entity” means entities as well as natural persons.

10 14. The terms “Communication,” “Communicate”, or “Communicated” refer to the
11 transmission, sending, and/or receipt of information of any means including but not limited to:
12 speech; writings; language; text and audio messages between mobile phones; text and audio
13 messages sent over mobile phone applications, such as Telegram, WhatsApp, and Signal;
14 emails; telephone; video tape; photographs; graphs; symbols; signs; magnetic disks; sound;
15 radio and/or video signal; teletype; telecommunication; telegram; microfilm; microfiche;
16 beepers or pagers; photographic film of any type; and/or other media of any kind.

17 15. The terms “Document” and “Documents” are used herein in the broadest sense
18 permissible under Rule 34 of the Federal Rules of Civil Procedure, and include, but are not
19 limited to, any written, recorded or tangible graphic matter, or any other means of preserving
20 data, expression, facts, opinions, thought, images, or other information of any kind, including
21 without limitation all non-identical copies, drafts, out takes, subsequent versions, worksheets
22 and proofs, however created or recorded, including without limitation audio tapes, annotations,
23 calendars, correspondence, data or information of any kind recorded on compact disks, digital

1 video diskettes, or any other type or form of diskettes for use with computers or other electronic
2 devices, or any hard drive, diary entries, electronic recordings of any kind, e-mail, memoranda,
3 notes, photographs, reports, telephone slips and logs, video cartridges and videotapes, and
4 sites, databases, or other means of information storage or retrieval on the Internet or the World
5 Wide Web. These terms are to be interpreted broadly to include documents stored in *any*
6 medium and specifically includes electronically stored information (“ESI”) such as e-mail and
7 documents maintained in electronic form on Your websites, servers, and standalone computers
8 and hard drives.¹

9 16. “Financial Statements” mean Documents and Communications demonstrating
10 Your financial performance and business activities over a given period of time, including
11 information regarding Your assets, liabilities, cash flow, and profitability. Financial Statements
12 include, but are not limited to, Your balance sheet for each fiscal year, Your income statement
13 for each fiscal year, and Your cash flow statement for each fiscal year.

14 17. “FTO” means any entity currently designated by the United States as a Foreign
15 Terrorist Organization or formerly designated by the United States as a Foreign Terrorist
16 Organization (*i.e.*, Ansarallah, also known as the Houthis).

17 18. “IS-DTO” means any entity currently designated by the State of Israel as a
18 terrorist organization or formerly designated by the State of Israel as a terrorist organization
19 (*i.e.*, Ansarallah, also known as the Houthis).

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21
22 ¹ ESI includes, but is not be limited to, all text files (including word processing documents), spread sheets, e-mail
23 files and information concerning e-mail (including all metadata fields, logs of e-mail history and usage, header
information and “deleted” files including all potentially relevant data contained in free or slack space), Internet
history files and preferences, graphical image format (“GIF”), tagged image file format (“TIFF”), portable
document format (“PDF”) files, databases, contacts, tasks, calendar and scheduling information, computer system
activity logs, all file fragments, and backup files containing Electronic Data.

1 19. “ Hamas” means the FTO also known as Harakat al-Muqawama al-Islamiya that
2 was designated an FTO by the United States in October 1997.

3 20. “October 7th” means the Hamas-led attack on Israel and its citizens that took
4 place on October 7, 2023.

5 21. “Social Media Activity” means any post, graphic, video, or any other content
6 disseminated via any social media platform such as Instagram, X (formerly known as Twitter),
7 Instagram, WhatsApp, Signal, Telegram, and TikTok, including any drafts of such content.

8 22. “Value Transfer” means the transfer of anything of value, including any
9 tangible or intangible thing having a market value, including, without limitation, money,
10 cryptocurrency, real property, personal property, services, loans of money or property,
11 gratuities, favors, grants, awards, rewards, scholarships, discounts, promises of future
12 employment, honoraria, event tickets, travel, lodging, meals, and the forbearance and
13 forgiveness of debt.

14 23. “Search List” refers to the following terms: “Encampment”; “Qatar”; “Turkey”;
15 “Iran”; “October 7”; “October 7th”; “10/7”; “Oct 7”; “Hamas”; “Hezbollah”; “Aljamal”;
16 “hostage”; “kidnapping”; “kidnap”; “Gaza”; “Nuseirat”; “Almog”; “Meir”; “Jan”; “Shlomi”;
17 “Ziv”; “Andrey”; and “Kozlov”.

18 **INSTRUCTIONS**

19 1. These requests apply to all items (*e.g.*, documents or things) in Your possession,
20 custody, or control at the present time, as well as all items that come into Your possession,
21 custody, or control. If You know of the existence, past or present, of any items requested below,
22 but are unable to produce such items because they are not presently in Your possession,
23 custody, or control, You shall so state and shall provide a written statement setting forth:

- (a) the identity of the item;
- (b) the nature of the item (*e.g.*, letter, memorandum, or chart);
- (c) the identity of the person(s) who created (*e.g.*, authored) the item;
- (d) the identity of any person who received a copy of the item;
- (e) the date of the item;
- (f) a brief description of the subject matter of the item; and
- (g) the identity of any person who has possession, custody, or control of the item.

2. If no documents are responsive to a particular request, state that no responsive documents exist.

3. For any responsive items (*e.g.*, documents or things) that have been lost, destroyed, withheld from production, or redacted, for any reason, You shall provide a written statement setting forth:

- (a) the identity of the item;
- (b) the nature of the item (*e.g.*, letter, memorandum, or chart);
- (c) the identity of the persons(s) who created (*e.g.*, authored) the item;
- (d) the identity of any person who received a copy of the item;
- (e) the date of the item;
- (f) a brief description of the subject matter of the item; and
- (g) the circumstances of the loss or destruction of the item or any fact, statute, rule, or decision upon which You rely in withholding or redacting the item.

1 4. If You decline to produce any document or part thereof based on a claim of
2 privilege or any other claim, describe the nature and basis of Your claim and the information
3 withheld in a manner sufficient:

4 (a) to disclose the facts upon which You rely in asserting Your claim;

5 (b) to permit the grounds and reasons for withholding the information to be
6 unambiguously identified; and

7 (c) to permit the information withheld to be unambiguously identified.

8 5. If any document produced contains any code, pseudonym, or acronym used to
9 describe, reference, or name any responsive material, You shall include a description of such
10 code along with the document produced. For example, the code word “Samah” (Hamas spelled
11 backwards) has been used to refer to Hamas.

12 6. All documents requested are to be produced in the same file or other
13 organizational environment in which they are maintained. For example, a document that is part
14 of a file, docket, or other grouping should be physically produced together with all other
15 documents from said file, docket, or grouping, in the same order or manner of arrangement as
16 in the original.

17 7. You shall keep and produce a record of the source of each document produced.
18 This shall include the name and location of the file where each document was located and the
19 name of the person, group, or department having possession, custody, or control of each
20 document.

21 8. Unless otherwise indicated, the time frame applicable to these Requests is
22 January 1, 2019, through the present.
23

RESPONSE:**INTERROGATORY NO. 5:**

List, Describe, and Identify any and all Value Transfers—either direct or indirect (*e.g.*, through an intermediary)—between or among You and Abdallah Aljamal and/or Fatima Aljamal from January 1, 2019 to the present. In Describing each Value Transfer, please list the bank account or other payment method from which the Value Transfer was sent, the bank account or other payment account which received the Value Transfer, whether the Value Transfer was made directly or through an intermediary, and, if so, what intermediaries (whether persons or intermediary bank accounts) were used to execute the transaction.

RESPONSE:**INTERROGATORY NO. 6:**

List, Describe, and Identify all websites, blogs, internet domains, social media accounts, and encrypted messaging services that You owned, created, controlled, managed, or contributed to from January 1, 2019 to the present.

RESPONSE:**INTERROGATORY NO. 7:**

Identify and Describe all methods of Communication, whether written or oral, and including, but not limited to, WhatsApp, Skype, SnapChat, Signal, and Telegram, that any Person employed by or affiliated with Palestine Chronicle used to Communicate with Abdallah Aljamal and/or Fatima Aljamal between January 1, 2019, and June 9, 2024, and whether records of those Communications have been preserved.

RESPONSE:

1
2 **INTERROGATORY NO. 8:** Describe the due diligence that You conduct before
3 employing, or making payments to, a Person in Gaza, the West Bank, Turkey, Qatar, or Iran
4 in order to ensure that any payments to that Person do not violate U.S. laws and regulations
5 regarding national security sanctions, including, but not limited to, 18 U.S.C. § 2339B
6 (material support of terrorism) and the International Emergency Economic Powers Act
7 (IEEPA), 50 U.S.C. § 1701.

8 **RESPONSE:**
9

10 **INTERROGATORY NO. 9:** List, Identify, and Describe any Persons known by You
11 as having participated in the attacks of October 7, 2023 in Israel and/or that held hostages in
12 Gaza, that You Communicated with, at any point between January 1, 2019 and the present.

13 **RESPONSE:**
14

15 **INTERROGATORY NO. 10:** List, Identify, and Describe any Hamas members or
16 Hamas associates with whom any Person employed by, or associated with, You Communicated
17 with between January 1, 2019, and the present, and List, Identify, and Describe Your employee
18 or associate who Communicated with such Hamas members or Hamas associates.

19 **RESPONSE:**
20

21 **INTERROGATORY NO. 11:** If any Document or Communication You produced
22 pursuant to a Request for Production served on You by Plaintiffs contains any code,
23

1 pseudonym, or acronym used to describe, reference, or name any responsive material, provide
2 a detailed description and explanation of such code, pseudonym, or acronym.

3 **RESPONSE:**

4
5 **INTERROGATORY NO. 12:** Describe and Identify the information technology
6 infrastructure that You use to Communicate and store Documents and data, including
7 information Relating to network design, the types of databases, database dictionaries, the
8 access control list and security access logs, rights of Persons to access the system and specific
9 files and applications, the ESI document retention policy, the organizational chart for
10 information systems personnel, or the backup and systems recovery routines, including, but
11 not limited to, tape rotation and destruction/overwrite policy.

12 **RESPONSE:**

13
14 **INTERROGATORY NO. 13:** For any Request for Admission served on You by
15 Plaintiffs that You denied, in whole or in part, provide a detailed explanation of the reason for
16 Your denial.

17 **RESPONSE:**

18
19 **INTERROGATORY NO. 14:** Identify each Person You or Your attorneys expect to
20 testify at trial as an expert witness and, for each such witness, Describe and Identify the subject
21 matter on which the expert is expected to testify; the substance of the facts and opinions to
22 which the expert will testify; and a summary of the grounds for each such opinion.

1 **INTERROGATORY NO. 15:** Identify and Describe with particularity the facts
2 Related to each and every one of Your affirmative defenses and, as to each affirmative defense,
3 the witnesses and Documents upon which You rely.

4 **RESPONSE:**

6 **REQUESTS FOR PRODUCTION**

7 **REQUEST FOR PRODUCTION NO. 1:** Produce any and all written and oral
8 Communications between any Person affiliated with Palestine Chronicle and Abdallah Aljamal
9 between January 1, 2019 and June 9, 2024. Produce all Communications regardless of who the
10 sender, recipient, or intended recipient may be and regardless of whether any recipient was
11 directly sent the Communications or was only copied on the Communications.

12 **RESPONSE:**

13
14 **REQUEST FOR PRODUCTION NO. 2:** Produce any and all written and oral
15 Communications between any Person affiliated with You and Fatima Aljamal between January
16 1, 2019 and June 9, 2024. Produce all Communications regardless of who the sender, recipient,
17 or intended recipient may be and regardless of whether any recipient was directly sent the
18 Communications or only copied on the Communications.

19 **RESPONSE:**

20
21 **REQUEST FOR PRODUCTION NO. 3:** Produce any and all Communications or
22 Documents Relating to Your hiring, employment, oversight, and compensation (including but
23 not limited to any Value Transfer) of, and/or relationship with, Abdallah Aljamal.

1 **RESPONSE:**

2

3 **REQUEST FOR PRODUCTION NO. 4:** Produce any and all Communications or

4 Documents Relating to Your hiring, employment, oversight, and compensation of (including

5 but not limited to any Value Transfer), and/or relationship with, Fatima Aljamal.

6 **RESPONSE:**

7

8 **REQUEST FOR PRODUCTION NO. 5:** Produce copies of Abdallah Aljamal's

9 Form W-2, Form 1099, or any other Documents Related to Abdallah Aljamal's salary, wages,

10 or other compensation (including non-monetary compensation) and/or Value Transfer from

11 You to Abdallah Aljamal between January 1, 2019, and the present, including any and all

12 records of deposits, wire transactions, or any other record of any and all payments that You

13 made to Abdallah Aljamal, whether directly or indirectly, and regardless of whether those

14 payments were classified as salary or in some other way.

15 **RESPONSE:**

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17 **REQUEST FOR PRODUCTION NO. 6:** Produce copies of Fatima Aljamal's Form

18 W-2, Form 1099, or any other Documents Related to Fatima Aljamal's salary, wages, or other

19 compensation (including non-monetary compensation) and/or Value Transfer from You to

20 Fatima Aljamal between January 1, 2019, and the present, including any and all records of

21 deposits, wire transactions, or any other record of any and all payments that You made to

22 Fatima Aljamal, whether directly or indirectly, and regardless of whether those payments were

23 classified as salary or in some other way.

1 **RESPONSE:**

2

3 **REQUEST FOR PRODUCTION NO. 7:** Produce any and all Documents and

4 Communications Relating to Your hierarchy and organizational structure. This request should

5 be deemed to include, but not be limited to, organization charts, reporting structures, and lists

6 of officers, directors, employees, and full or part time contractors.

7 **RESPONSE:**

8

9 **REQUEST FOR PRODUCTION NO. 8:** Produce any and all Documents and

10 Communications Relating to Your formation and Your corporate governance, including, but

11 not limited to, any Articles of Incorporation, bylaws, director meeting minutes, and any other

12 Communications sufficient to disclose Your formation and organization.

13 **RESPONSE:**

14

15 **REQUEST FOR PRODUCTION NO. 9:** Produce any and all Documents and

16 Communications between You and Your affiliates, directors, officers, employees, contractors,

17 volunteers, interns, agents, or representatives, which contain, or Relate to, the terms provided

18 in the Search List. *If You believe the use of search parameters and ESI is necessary to respond*

19 *to this Request, please provide Your proposed methodology for responding to this Request*

20 *pursuant to Your obligations under the Federal Rules of Civil Procedure.*

21 **RESPONSE:**

22

23

1 **REQUEST FOR PRODUCTION NO. 10:** Produce any and all Documents and
2 Communications Relating to Abdallah Aljamal that contain any of the terms provided in the
3 Search List. *If You believe the use of search parameters and ESI is necessary to respond to*
4 *this Request, please provide Your proposed methodology for responding to this Request*
5 *pursuant to Your obligations under the Federal Rules of Civil Procedure.*

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 11:** Produce any and all Documents and
9 Communications Relating to Fatima Aljamal that contain any of the terms provided in the
10 Search List. *If You believe the use of search parameters and ESI is necessary to respond to*
11 *this Request, please provide Your proposed methodology for responding to this Request*
12 *pursuant to Your obligations under the Federal Rules of Civil Procedure.*

13 **RESPONSE:**

14
15 **REQUEST FOR PRODUCTION NO. 12:** Produce any and all Documents and
16 Communications Relating to Nurah Tape-Sallie that contain any of the terms provided in the
17 Search List. *If You believe the use of search parameters and ESI is necessary to respond to*
18 *this Request, please provide Your proposed methodology for responding to this Request*
19 *pursuant to Your obligations under the Federal Rules of Civil Procedure.*

20 **RESPONSE:**

21
22 **REQUEST FOR PRODUCTION NO. 13:** Produce any and all Documents and
23 Communications Relating to Francesca Albanese that contain any of the terms provided in the

1 Search List. *If You believe the use of search parameters and ESI is necessary to respond to*
 2 *this Request, please provide Your proposed methodology for responding to this Request*
 3 *pursuant to Your obligations under the Federal Rules of Civil Procedure.*

4 **RESPONSE:**

6 **REQUEST FOR PRODUCTION NO. 14:** Produce any and all Social Media
 7 Activity from any account over which You exercise some possession, custody, or control that
 8 Relate to, or contain, any of the terms provided in the Search List. *If You believe the use of*
 9 *search parameters and ESI is necessary to respond to this Request, please provide Your*
 10 *proposed methodology for responding to this Request pursuant to Your obligations under the*
 11 *Federal Rules of Civil Procedure.*

12 **RESPONSE:**

14 **REQUEST FOR PRODUCTION NO. 15:** Produce any and all Social Media Activity
 15 from any account over which You exercise some possession, custody, or control that Relates
 16 to (i) any FTO, and/or (ii) IS-DTO. This includes, but is not limited to, Relating to current or
 17 former members, affiliates, directors, officers, employees, contractors, volunteers, interns,
 18 agents, or representatives, or that demonstrates a relationship, connection, or communication
 19 with an FTO and/or IS-DTO.

20 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 16:** Produce any and all Communications,
 23 either direct or indirect (*e.g.*, through an intermediary), between any employee or affiliate of

1 Yours and an FTO. This includes, but is not limited to, Communications to the FTO's current
2 or former members, affiliates, directors, officers, employees, contractors, volunteers, interns,
3 agents, or representatives, or that demonstrates a relationship, connection, or communication
4 that FTO. Produce all Communications from January 1, 2015 to the present. Produce all
5 Communications regardless of who the sender, recipient, or intended recipient may be and
6 regardless of whether any recipient was directly sent the Communications or was only copied
7 on the Communications.

8 **RESPONSE:**

9
10 **REQUEST FOR PRODUCTION NO. 17:** Produce any and all Communications,
11 either direct or indirect (*e.g.*, through an intermediary), between any employee or affiliate of
12 You and an IS-DTO. This includes, but is not limited to, Communications to IS-DTO's current
13 or former members, affiliates, directors, officers, employees, contractors, volunteers, interns,
14 agents, or representatives, or that demonstrates a relationship, connection, or communication
15 with that IS-DTO. Produce all Communications from January 1, 2015 to the present. Produce
16 all Communications regardless of who the sender, recipient, or intended recipient may be and
17 regardless of whether any recipient was directly sent the Communications or was only copied
18 on the Communications.

19 **RESPONSE:**

20
21 **REQUEST FOR PRODUCTION NO. 18:** Produce any and all Documents and
22 Communications Relating to any of Your owner's, director's, and/or employee's international
23 and domestic travel, including, but not limited to, travel arrangements, accommodations,

1 Communications with travel agencies, flight records, confirmation records, airline tickets,
2 boarding passes, hotel reservation confirmations, credit card statements, and customs
3 documentation. Please produce these Documents and Communications from January 1, 2019,
4 to the present date.

5 **RESPONSE:**

6
7 **REQUEST FOR PRODUCTION NO. 19:** Produce copies of Your profit and loss
8 statements, Financial Statements, and any other Documents showing assets, profits, and
9 liabilities between January 1, 2019, and the present.

10 **RESPONSE:**

11
12 **REQUEST FOR PRODUCTION NO. 20:** Produce copies of Your tax Documents
13 prepared or filed between January 1, 2019, and the present, including but not limited to state
14 and federal business income tax returns, state and federal gift tax returns, Forms 990, Forms
15 1023, and IRS or other governmental agency examination reports and work papers, including
16 all adjustments made regarding the business. Notwithstanding the timeframe, please include
17 Your Form 1023 if the same was filed prior to January 1, 2019.

18 **RESPONSE:**

19
20 **REQUEST FOR PRODUCTION NO. 21:** Produce copies of Communications and
21 Documents sent to any Person who prepared, assisted in preparing, filed, or assisted in filing
22 the tax Documents described in the preceding Request For Production, including, but not
23 limited to, an accountant or bookkeeper.

1 **RESPONSE:**

2
3 **REQUEST FOR PRODUCTION NO. 22:** Produce copies of Your bank statements

4 or statements of any and each of Your financial accounts from January 1, 2019 to the present.

5 **RESPONSE:**

6
7 **REQUEST FOR PRODUCTION NO. 23:** Produce copies of Your general ledger

8 from January 1, 2019 to the present.

9 **RESPONSE:**

10
11 **REQUEST FOR PRODUCTION NO. 24:** Produce supporting Documents for all

12 expenses incurred and recorded on Your General Ledger from January 1, 2019 to the present.

13 **RESPONSE:**

14
15 **REQUEST FOR PRODUCTION NO. 25:** Produce a full and unadulterated copy of

16 Your QuickBooks (or other bookkeeping software) from January 1, 2019 to the present.

17 **RESPONSE:**

18
19 **REQUEST FOR PRODUCTION NO. 26:** Produce copies of any and each of Your

20 credit card statements from January 1, 2019 to the present.

21 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 27:** Produce any and all Documents and
2 Communications Relating to any Value Transfer—either direct or indirect (*e.g.*, through an
3 intermediary)—between or among You and Abdallah Aljamal from January 1, 2019, to the
4 present, including, but not limited to, bank account records, records of wire transfers, records
5 of direct deposits, records of payments on payment applications, such as CashApp, Zelle,
6 Venmo, or PayPal, records of payments using any cryptocurrency, and any other written
7 records of any such Value Transfer.

8 **RESPONSE:**

9

10 **REQUEST FOR PRODUCTION NO. 28:** Produce any and all Documents and
11 Communications Relating to any Value Transfer—either direct or indirect (*e.g.*, through an
12 intermediary)—between or among You and Fatima Aljamal from January 1, 2019, to the
13 present, including, but not limited to, bank account records, records of wire transfers, records
14 of direct deposits, records of payments on payment applications, such as CashApp, Zelle,
15 Venmo, or PayPal, records of payments using any cryptocurrency, and any other written
16 records of any such Value Transfer.

17 **RESPONSE:**

18

19 **REQUEST FOR PRODUCTION NO. 29:** Produce any and all Documents and
20 Communications Relating to financial support (including but not limited to any Value
21 Transfer) to You in consideration for Your publication of Abdallah Aljamal's articles,
22 Communications, or Documents.

23 **RESPONSE:**

REQUEST FOR PRODUCTION NO. 30: Produce any and all Documents and Communications Relating to any Value Transfer—either direct or indirect (*e.g.*, through an intermediary)—between or among You and any entity or individual located in Gaza, the West Bank, Turkey, Qatar, or Iran at the time of transfer, including, but not limited to, bank account records, records of wire transfers, records of direct deposits, records of payments on payment applications, such as CashApp, Zelle, Venmo, or PayPal, records of payments using any cryptocurrency, and any other written records of any such Value Transfer. Please produce these records from January 1, 2019 to the present date.

RESPONSE:

REQUEST FOR PRODUCTION NO. 31: Produce any and all Documents and Communications, including, but not limited to, marketing materials, pamphlets, attendee lists, speaker lists, transcripts, and sponsors, of any events, conferences, or meetings, formal or informal, concerning or Related to the terms of the Search List at which You have spoken at, were invited to, attended, or were otherwise involved or affiliated with. *If You believe the use of search parameters and ESI is necessary to respond to this Request, please provide Your proposed methodology for responding to this Request pursuant to Your obligations under the Federal Rules of Civil Procedure.*

RESPONSE:

1 **REQUEST FOR PRODUCTION NO. 32:** Produce any and all Documents and
2 Communications shared or disseminated by You that were created, posted, or published by any
3 FTO prior to Your sharing or dissemination of the same from January 1, 2019 to the present.

4 **RESPONSE:**

5
6 **REQUEST FOR PRODUCTION NO. 33:** Produce any and all Documents and
7 Communications Relating to a full listing of Your financial donors, sponsors, and supporters
8 from January 1, 2019 to the present date.

9 **RESPONSE:**

10
11 **REQUEST FOR PRODUCTION NO. 34:** Produce any and all Documents and
12 Communications Relating to any and all fundraising activities You conducted, sponsored,
13 promoted, advertised, authorized, or participated in, including fundraising for the benefit of
14 other organizations. Please produce these records from January 1, 2019 to the present date.

15 **RESPONSE:**

16
17 **REQUEST FOR PRODUCTION NO. 35:** Produce any and all Documents and
18 Communications Related to the use, receipt, and disposition of Your monies and/or Your funds
19 that was sent to, or intended for use by, any Persons in Gaza, the West Bank, Qatar, Iran,
20 Turkey, Lebanon, Egypt, or Syria. Please produce these records from January 1, 2019 to the
21 present date.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 36:** Produce any and all Documents and
2 Communications Related to the registration and maintenance of any website, blog, social
3 media account, or internet domain name owned, controlled, created, or maintained by or on
4 behalf of You.

5 **RESPONSE:**

6

7 **REQUEST FOR PRODUCTION NO. 37:** Produce any and all Documents Related
8 to Your compliance, or Your efforts to comply, with United States laws or regulations
9 regarding national security sanctions, including, but not limited to, 18 U.S.C. § 2339B
10 (material support of terrorism) and International Emergency Economic Powers Act (IEEPA),
11 50 U.S.C. § 1701.

12 **RESPONSE:**

13

14 **REQUEST FOR PRODUCTION NO. 38:** Produce any and all Documents and
15 Communications requested by any interrogatory served by Plaintiffs, identified in Your
16 responses thereto, or consulted or relied upon in the formulation of Your responses thereto.

17 **RESPONSE:**

18

19 **REQUEST FOR PRODUCTION NO. 39:** Produce any and all Documents and
20 Communications provided to or relied upon by each Person You expect to call as an expert
21 witness at the trial of this action to form his or her opinion, all reports, Documents or
22 Communications prepared by each such Person Relating to this action, and a complete
23 curriculum vitae and resume for each such Person.

1 **RESPONSE:**

2

3 **REQUEST FOR PRODUCTION NO. 40:** Produce any and all records describing

4 the processing of these Requests For Production, including records sufficient to identify the

5 search terms used and locations and custodians searched, and any tracking sheets used to track

6 the processing of these Requests For Production. If You used questionnaires or certifications

7 completed by individual custodians or components to determine whether they possess

8 responsive materials or to describe how they conducted searches, provide any such records


9 prepared in connection with the processing of those Requests.

10 **RESPONSE:**

11

12 DATED this 18th of April 2025.

13 Respectfully submitted,
TOMLINSON BOMSZTYK RUSS

14 By:  _____
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23 anat@jewishadvocacycenter.org

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HOLTZMAN VOGEL BARAN
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Erielle Davidson (*pro hac vice*)
John J. Cycon (*pro hac vice*)
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Counsel for Plaintiffs

PARTY VERIFICATION

STATE OF WASHINGTON)
) ss
COUNTY OF _____)

_____, being first duly sworn on oath, deposes and says:

I am a Representative of Defendant People Media Project d/b/a Palestine Chronicle; I have read the foregoing answers to Requests for Production, know the contents thereof, and believe the same to be true personally.

Printed Name: _____
Its: _____

Subscribed and sworn to before me on _____, 2025.

NOTARY PUBLIC in and for the
State of Washington
Residing in _____ County
My Commission Expires: _____
Printed Name: _____

CERTIFICATION OF ATTORNEY

The undersigned attorney for Defendant People Media Project d/b/a Palestine Chronicle, has read Plaintiffs' Requests for Production, and the answers, responses and objections thereto, and they are in compliance with CR 26(g) and the local rules of this Court.

DATED this ____ day of _____, 2025.

By: _____
Daniel M. Kovalik
Attorney for Defendant, People Media Project
d/b/a Palestine Chronicle

CERTIFICATE OF SERVICE

I am employed by the law firm of Tomlinson Bomsztyk Russ, over the age of 18, not a party to this action, and competent to be a witness herein.

On Friday, April 18, 2025, I caused a true and correct copy of the foregoing document (*Plaintiffs First Interrogatories and Requests for Production to People Media Project d/b/a Palestine Chronicle*) to be delivered to the following in the manner indicated below:

COUNSEL FOR DEFENDANTS:

Daniel Kovalik
112 Washington Place, Suite 15K
Pittsburgh, Pennsylvania 12519
Phone: (412) 335-6442

- ☐ Via United States Mail
☐ Via Legal Messengers
☐ Via Facsimile
☒ Via Email: *dkovalik@outlook.com*

Ralph Hurvitz
P.O. Box 25642
Seattle, Washington 98165
Phone: (206) 223-1747

- ☐ Via United States Mail
☐ Via Legal Messengers
☐ Via Facsimile
☒ Via Email: *ralph@hurvitz.com*

I declare under penalty of perjury under the laws of the State of Washington that the following is true and correct.

DATED this 18th day of April 2025, in Snohomish County, Washington.

Signature: _____



Lisa Sebree

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

ALMOG MEIR JAN, SHLOMI ZIV, and
ANDREY KOZLOV,
Plaintiffs,
v.

NO. 3:24-cv-05553-TLF

**PLAINTIFFS' FIRST REQUESTS
FOR ADMISSION**

PEOPLE MEDIA PROJECT, a Washington
Non-Profit Corporation, d/b/a PALESTINE
CHRONICLE; RAMZY BAROUD; JOHN
HARVEY; and DOES 1 through 10,
Defendants.

**PLAINTIFFS' FIRST REQUESTS FOR ADMISSION TO DEFENDANTS:
PEOPLE MEDIA PROJECT d/b/a PALESTINE CHRONICLE**

Pursuant to Federal Rule of Civil Procedure 36, Plaintiffs Almog Meir Jan, Shlomi Ziv, and Andrey Kozlov (collectively, "Plaintiffs"), request that Defendant People Media Project d/b/a People Media Project ("Defendant") each respond to the following Requests for Admission within thirty (30) days of service of these Requests.

DEFINITIONS

For purposes of these requests only, Plaintiffs use the following definitions:

1. "You" or "Your" means Defendant People Media Project d/b/a Palestine Chronicle as well as any directors, agents, employees, independent contractors, volunteers, attorneys, partners, agents, representatives, or any other person or entity acting or purporting to act on behalf the Defendant People Media Project d/b/a Palestine Chronicle.,

2. “And” and “or” mean and include both the conjunctive and the disjunctive, and shall be construed as necessary to bring within the scope of this request all responses that might otherwise be construed to be outside their scope.

3. “Aljamal” means Abdallah Aljamal.

INSTRUCTIONS

1. These Requests are directed to all Your knowledge, including any person or entity acting or purporting to act on Your behalf, at Your direction, or under Your supervision, and to all possible sources of such knowledge, be they documentary, testimonial, or otherwise, which are known to any of the aforesaid or to any and all persons acting on its behalf.

2. Each of the statements made below shall be deemed admitted unless You serve on Plaintiffs, within thirty (30) days after service of these Requests, a written answer directed specifically to that matter and otherwise conforming to the requirements of Fed. R. Civ. P. 36.

3. The grounds for objecting to a request must be stated with specificity. Any ground not stated in a timely objection is waived unless the Court, for good cause, excuses the failure.

4. Your response shall specifically admit or deny the matter or set forth in detail the reasons why You cannot truthfully admit or deny the matter.

5. When good faith requires that only part of the matter of which an admission is requested be denied or qualified, specify how much of the matter is true and qualify or deny the remainder.

6. You may not assert lack of information or knowledge as a reason for failure to admit or deny unless You state that You have made reasonable inquiry and that the information

1 known to, or readily obtainable by You is insufficient to enable You to admit or deny the
2 specific Requests.

3 7. If in answering any Request You claim an ambiguity in interpreting a Request,
4 such claim shall not be asserted as a basis for refusing to respond, but instead, You shall set
5 forth as part of Your response to such Request the language deemed to be ambiguous, and the
6 interpretation chosen to be used in responding to the Request.

7 8. These Requests are continuing in nature, and to the extent Your responses may
8 be modified by information acquired subsequent to Your initial responses hereto, You are
9 required, to the extent set forth in Fed. R. Civ. P. 36, to promptly serve supplemental responses
10 reflecting such changes.

11 9. Any failure to comply with these requirements may subject You to sanctions
12 pursuant to Fed. R. Civ. P. 37, including the exclusion from trial of documentary testimonial
13 or other evidence favorable to You, and an award requiring You to pay Plaintiffs' expenses,
14 including attorney's fees.

15 **REQUESTS FOR ADMISSION**

16 **REQUEST FOR ADMISSION NO. 1:** Admit that You were and are aware that, on
17 October 7, 2023, Hamas, the organization designated by the U.S. Secretary of State in October
18 1997 as a Foreign Terrorist Organization, murdered and kidnapped Israeli civilians.

19 **ANSWER:**

20
21 **REQUEST FOR ADMISSION NO. 2:** Admit that among those kidnapped on
22 October 7, 2023, were all three Plaintiffs: Almog Meir Jan, Shlomi Zin, and Andrey Kozlov.

23 **ANSWER:**

1
2 **REQUEST FOR ADMISSION NO. 3:** Admit that Plaintiffs, Almog Meir Jan, Shlomi
3 Zin, and Andrey Kozlov, were held in captivity by Hamas from October 7, 2023, until the
4 Israeli Defense Force (IDF) rescued the Plaintiffs on June 8, 2024.

5 **ANSWER:**
6

7 **REQUEST FOR ADMISSION NO. 4:** Admit that Plaintiffs were recovered from the
8 home of Abdallah Aljamal.

9 **ANSWER:**
10

11 **REQUEST FOR ADMISSION NO. 5:** Admit that Abdallah Aljamal was killed by
12 IDF forces on June 8, 2024.

13 **ANSWER:**
14

15 **REQUEST FOR ADMISSION NO. 6:** Admit that Abdallah Aljamal was a
16 spokesperson for Hamas from at least January 1, 2023, until his death.

17 **ANSWER:**
18

19 **REQUEST FOR ADMISSION NO. 7:** Admit that, from at least October 7, 2023,
20 until June 8, 2024, You were aware that Abdallah Aljamal had been a spokesperson for Hamas.

21 **ANSWER:**
22
23

1 **REQUEST FOR ADMISSION NO. 8:** Admit You employed Abdallah Aljamal until
2 his death on June 8, 2024.

3 **ANSWER:**
4

5 **REQUEST FOR ADMISSION NO. 9:** Admit that Fatima Aljamal, the spouse of
6 Abdallah Aljamal, was likewise employed and compensated by You from at least January 1,
7 2023, until her death.

8 **ANSWER:**
9

10 **REQUEST FOR ADMISSION NO. 10:** Admit that People Media Project d/b/a
11 Palestine Chronicle is a 501(c)(3) nonprofit corporation incorporated in the State of
12 Washington.

13 **ANSWER:**
14

15 **REQUEST FOR ADMISSION NO. 11:** Admit that People Media Project d/b/a
16 Palestine Chronicle's principal place of business is in Olympia, Washington.

17 **ANSWER:**
18

19 **REQUEST FOR ADMISSION NO. 12:** Admit that People Media Project d/b/a
20 Palestine Chronicle operates an English language and U.S.-based news outlet under the name
21 Palestine Chronicle, covering events concerning the Middle East and Palestine.

22 **ANSWER:**
23

1 **REQUEST FOR ADMISSION NO. 13:** Admit that Defendant Ramzy Baroud has
2 been the Editor-in-Chief of Palestine Chronicle and a Governor of People Media Project from
3 at least January 1, 2023, to present.

4 **ANSWER:**

5
6 **REQUEST FOR ADMISSION NO. 14:** Admit that Defendant Ramzy Baroud is
7 ultimately responsible for the management of the Palestine Chronicle.

8 **ANSWER:**

9
10 **REQUEST FOR ADMISSION NO. 15:** Admit that Defendant John Harvey has been
11 a Governor of People Media Project and its “Principal Officer” from at least January 1, 2023,
12 to present.

13 **ANSWER:**

14
15 **REQUEST FOR ADMISSION NO. 16:** Admit that Defendant John Harvey
16 ultimately oversees the management and financial decisions of the Palestine Chronicle.

17 **ANSWER:**

18
19 **REQUEST FOR ADMISSION NO. 17:** Admit that You were aware that Hamas has
20 been designated by the United States Government a Foreign Terrorist Organization prior to
21 October 7, 2023.

22 **ANSWER:**

1 **REQUEST FOR ADMISSION NO. 18:** Admit that You were aware that Hamas has
2 been designated by the United States Government a Foreign Terrorist Organization after
3 October 7, 2023.

4 **ANSWER:**

5
6 **REQUEST FOR ADMISSION NO. 19:** Admit that, between October 7, 2023, and
7 Abdallah Aljamal's death, You published over twelve (12) articles written by Aljamal.

8 **ANSWER:**

9
10 **REQUEST FOR ADMISSION NO. 20:** Admit that, between October 7, 2023, and
11 Abdallah Aljamal's death, You compensated Aljamal for his work product You published.

12 **ANSWER:**

13
14 **REQUEST FOR ADMISSION NO. 21:** Admit that, on June 9, 2024, You changed
15 Abdallah Aljamal's title on the Palestine Chronicle website from "correspondent for The
16 Palestine Chronicle" to "contributor."

17 **ANSWER:**

18
19 **REQUEST FOR ADMISSION NO. 22:** Admit that, during the period from January
20 1, 2023, to June 7, 2024, You were aware that Abdallah Aljamal was an associate of Hamas.

21 **ANSWER:**

1 **REQUEST FOR ADMISSION NO. 23:** Admit that, during Your engagement with
2 Abdallah Aljamal after October 7, 2023, and before his death, You were aware that Aljamal
3 participated in the actions of Hamas on October 7, 2023.

4 **ANSWER:**

5
6 **REQUEST FOR ADMISSION NO. 24:** Admit that, after October 7, 2023, and before
7 his death, Ramzy Baroud viewed Abdallah Aljamal's Facebook page.

8 **ANSWER:**

9
10 **REQUEST FOR ADMISSION NO. 25:** Admit that after October 7, 2023, and before
11 his death, Ramzy Baroud viewed Abdallah Aljamal's TikTok page.

12 **ANSWER:**

13
14 **REQUEST FOR ADMISSION NO. 26:** Admit that You were in direct contact with
15 Abdallah Aljamal between October 7, 2023, and Aljamal's death.


16 **ANSWER:**

17
18 **REQUEST FOR ADMISSION NO. 27:** Admit that You communicated with
19 Abdallah Aljamal between October 7, 2023, and Aljamal's death, using a messaging
20 application.

21 **ANSWER:**

1 DATED this 18th of April 2025.

2 Respectfully submitted,
3 TOMLINSON BOMSZTYK RUSS

4 By: 
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6 Blair M. Russ, WSBA #40374
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9 T: 206.621.1871
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11 bmr@tbr-law.com

12 NATIONAL JEWISH ADVOCACY
13 CENTER, INC.
14 THE INTERNATIONAL LEGAL FORUM
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Phone: (202) 737-8808

Counsel for Plaintiff

CERTIFICATION OF ATTORNEY

The undersigned attorney for Defendant, People Media Project d/b/a Palestine Chronicle, has read Plaintiffs' Requests for Admissions, and the answers, responses, and objections thereto, and they are in compliance with CR 36 and the local rules of this Court.

DATED this ____ day of _____, 2025.

By: _____
Daniel M. Kovalik
Attorney for Defendant, People Media Project
d/b/a Palestine Chronicle

CERTIFICATE OF SERVICE

I am employed by the law firm of Tomlinson Bomsztyk Russ, over the age of 18, not a party to this action, and competent to be a witness herein.

On Friday, April 18, 2025, I caused a true and correct copy of the foregoing document (*Plaintiffs First Requests for Admission*) to be delivered to the following in the manner indicated below:

COUNSEL FOR DEFENDANTS:

Daniel Kovalik, Esq.
112 Washington Place, Suite 15K
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Phone: (412) 335-6442

- ☐ Via United States Mail
☐ Via Legal Messengers
☐ Via Facsimile
☒ Via Email: *dkovalik@outlook.com*

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Seattle, Washington 98165
Phone: (206) 223-1747

- ☐ Via United States Mail
☐ Via Legal Messengers
☐ Via Facsimile
☒ Via Email: *ralph@hurvitz.com*

I declare under penalty of perjury under the laws of the State of Washington that the following is true and correct.

DATED this 18th day of April 2025, in Snohomish County, Washington.

Signature: _____



Lisa Sebree